Compliance Report 2019
Acting in accordance with the law and legal regulations is an integral part of the corporate culture of innogy SE. The principles and goals of this culture are based on the innogy Code of Conduct. The focus of our Compliance Management System (CMS) is therefore on identifying potential structural risks of corruption and avoiding corruption and non-compliant conduct within the innogy Group. All business activities and decisions are strictly aligned with our compliance guidelines. Corruption and any kind of violations will not be tolerated.

KPMG audited the effectiveness of innogy SE’s Compliance Management System for anti-corruption based on the audit standard IDW 980. For the legal areas of anti-money laundering and foreign trade law the adequacy of the concept and its implementation were audited based on audit standard IDW 980 as well. These audits were successfully completed in 2019.
Raising the level of awareness among our employees is the key to preventing corruption. The most important document in this regard is the innogy Code of Conduct, which is binding for all employees. It prohibits all forms of corruption and is tightly integrated with other Group Directives. The Code of Conduct is preceded by ten overall behavioural principles. These principles summarise the Code’s main points and permit quick reference. In day-to-day work, adherence to the Directives is supported by organisational requirements such as the four-eyes principle, segregation of duties, authorisation concepts and approval provisions.

For the practical effectiveness of a compliance organisation, it is of vital importance to create an awareness of critical issues in the work environment. Appropriate communication is therefore highly essential for the success of the compliance organisation. Internal Group media (e.g., Intranet presence or event-related news) inform our employees about compliance issues, such as current developments, behavioural requirements for compliance, and possible risks in the event of violations.

Training courses clarify

Our employees are trained via a web-based training program as well as in face-to-face trainings. In 2019, the web-based training focused on the topic of anti-corruption. Participation in our face-to-face training courses is mandatory for all employees who are subject to the risk of misconduct in their respective activities. In 2019, we trained a total of more than 4,480 employees in Germany and around 590 employees in other business regions through face-to-face events.

Transparency motivates

Corruption offences are always associated with the reputation of the ‘secret’. To make compliance-sensitive processes transparent, we introduced an IT tool in 2010 in which all donation and sponsoring processes, compliance-relevant consulting agreements and contributions to public officials in accordance with our guidelines are recorded. This tool is continuously being developed and improved.
Our compliance organisation is headed by the Chief Compliance Officer (CCO). At innogy SE, it is Dr Frank Then since March 2019. The CCO reports regularly to the Management Board and the Audit Committee of the Supervisory Board of innogy SE on compliance-relevant topics. Compliance Officers in all operating companies ensure a uniform implementation of the Group-wide principles of a compliant behaviour. They report on their activities to the Chief Compliance Officer on a regular basis. In regions where innogy operates multiple subsidiaries, compliance tasks are handled by country officers.

The Group Internal Audit department regularly carries out preventive compliance audits in the Group companies. We thus monitor both the implementation and the efficacy of our compliance management system throughout the Group. We always investigate indications of possible infringements and, if required, initiate the necessary measures.

Whistleblower system

Information about possible violations of the Code of Conduct or other non-compliant behaviour can be communicated to superiors or Compliance Officers. In addition, an independent external contact person is available to provide information to employees or third parties regarding violations. Reports can be submitted in the respective local languages of the innogy Group companies and must be treated confidentially and if desired anonymously. Since 1 April 2011 the international law firm Simmons & Simmons, which is partly supported by local law firms, has acted as the external contact for the entire Group.